



CARLA M. BUTLER

November 15, 2018

Via Electronic Filing Only

Gary Widerburg
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111
psc@utah.gov

Re: Docket No. 18-999-15

Dear Mr. Widerburg:

Attached for filing in the above entitled docket please find CenturyLink's Comments in Response to the Notice of Investigation and Comment Period, along with a Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is fluid and cursive, with the first letter "C" being large and prominent.

Carla Butler
Paralegal

Attachment
cc: Service List

310 SW Park Ave., 11th Flr.
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Torry R. Somers
CenturyLink
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Attorney for CenturyLink

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Investigation into Management of Utah
Universal Service Fund Contribution Method

DOCKET NO. 18-999-15

**COMMENTS IN RESPONSE TO THE NOTICE OF INVESTIGATION
AND COMMENT PERIOD**

Qwest Corporation d/b/a CenturyLink QC and CenturyLink Communications, LLC (“CenturyLink”) appreciate the opportunity to file comments. On October 9, 2018 the Utah Public Service Commission (“Commission”) issued a Notice of Investigation and Comment Period, regarding the management of the Utah Universal Service fund (“UUSF”). Specifically, the Commission is seeking comments regarding Utah legislative goals *“that the PSC maintain a UUSF balance of at least three months of UUSF payments, and that the PSC not modify the UUSF contribution method more than once every three fiscal years.”*¹

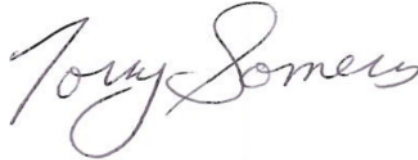
Even though CenturyLink believes that the legislative goals outlined above may be intended to help maintain a stable UUSF, the Commission has been heavily involved in multiple recent dockets where providers are seeking Lifeline support and changes in ongoing draws in the

¹ Docket No. 18-999-05, October 9, 2018 Notice. Website link: <https://psc.utah.gov/2018/10/09/docket-no-18-999-15/>

UUSF that may make achieving the legislative goal difficult at this time. Additionally, it is CenturyLink's understanding that the Utah Division of Public Utilities continues to take steps to ensure that all providers contribute to the UUSF. At this time, it is still not apparent that all providers are appropriately contributing to the UUSF. With the Commission still in the process of implementing the changes caused by Senate Bill 130, it will be difficult, and may not even be in the best interests of Utahans to take all steps to immediately meet the legislative goals. As time passes and it becomes clear that all providers are appropriately paying into the UUSF, and there is more certainty about what providers will be requesting from the UUSF on a longer-term basis, the goals set forth by the legislature may be more attainable.

RESPECTFULLY SUBMITTED this 15th day of November 2018.

CENTURYLINK

A handwritten signature in cursive script that reads "Torry Somers".

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Attorney for CenturyLink

CERTIFICATE OF SERVICE
VIA EMAIL TRANSMISSION
Docket No. 18-999-15

I hereby certify that on the 15th day of November, 2018, I caused a true and correct copy of the foregoing CENTURYLINK'S COMMENTS IN RESPONSE TO THE NOTICE OF INVESTIGATION AND COMMENT PERIOD to be served upon the following persons via electronic mail at the e-mail addresses shown below.

Public Service Commission:

psc@utah.gov

Utah Division of Public Utilities:

Justin Jetter – jjetter@utah.gov

Bill Duncan – wduncan@utah.gov

Chris Parker – chrisparker@utah.gov

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Office of Consumer Service:

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CENTURYLINK



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